

red, green, and blue filters bonded at a back surface of the main substrate 33, respectively. Rather, the EL device portion 34 includes a light emission layer 43 that *emits white light* and that is adjacent to red, blue, and green filters 47 to 49 bonded at the back surface of the main substrate 33. See col. 16, lines 48-60. Bando does not remedy this deficiency of Terrada.

The Examiner refers to Yoneda as disclosing the missing feature of forming red, green, and blue light emitting elements that emit red, green, and blue light, respectively, stating:

Further, Yoneda teaches that it is conventional in an electroluminescent (EL) display to provide a red light-emitting device, a green light-emitting device and a blue light-emitting device (Fig. 1; column 1, lines 53-61).

Therefore, at the time of the invention, it would have been obvious to one of ordinary skill in the art to use the method taught by Terrada and Bando together, and further substitute a red light-emitting device, a green light-emitting device, and a blue light-emitting device adjacent to each of Terrada's red, green, and blue color filters, respectively, for the light-emitting device taught by Terrada, since Yoneda teaches that it is conventional in the semiconductor art of manufacturing EL displays to form each of a red, green, and blue light-emitting device, and Terrada teaches forming color filters adjacent to light-emitting devices.

Page 3 of Final Office Action. Accordingly, the Examiner is apparently stating that because Yoneda discloses as "conventional" an EL device structure having red, green, and blue light emitting elements, a person skilled in the art would be led to replace the single white light emitting layer 43 of Yoneda with red, green, and blue light emitting elements. Applicants respectfully submit that this is not a proper motivation to combine. In particular, the Examiner has not identified any benefit or advantage that would result from such a modification and that would motivate a person skilled in the art at the time of the invention to replace the single white light emitting layer 43 of Terrada with the "conventional" red, green, and blue light emitting elements of Yoneda.

Moreover, Yoneda teaches away from the modification proposed by the Examiner. Yoneda states that the "conventional structure" has a problem in that the manufacturing of the conventional structure requires an increased number of fabrication steps due to the red, green, and blue color light emitting layers having to be separately formed through successive and different manufacturing steps. See col. 1, lines 61-63. Yoneda proposes a solution to this problem by replacing the red, green, and blue color light emitting layers with a single white color light-emitting layer and using red, green, and blue color filters. See col. 2, lines 1-9 and 20-39. Accordingly, Yoneda's teachings do not suggest that it would be desirable to replace the single

white light emitting layer 43 of Terrada with the red, green, and blue color light emitting layers of the “conventional” structure, as suggested by the Examiner. Rather, Yoneda teaches the exact opposite – that it would be desirable to replace the red, green, and blue color light emitting layers of the “conventional” structure with a single white color layer, like Terrada’s white light emitting layer 43, and red, green, and blue color filters.

For at least these reasons, the Examiner has not established a prima facie case of obviousness and, therefore, applicants request reconsideration and withdrawal of the rejection of claim 9.

Independent claim 10 recites: “forming a thin film transistor and a light emitting element emitting red light, a light emitting element emitting green light and a light emitting element emitting blue light being electrically connected to the thin film transistor at a front surface of a substrate” and “bonding a red color filter adjacent to the light emitting element emitting red light, a green color filter adjacent to the light emitting element emitting green light and a blue color filter adjacent to the light emitting element emitting blue light at the polished back surface of the substrate.” For at least the same reasons described above with respect to claim 9, neither Terada, Bando, Yoneda, nor any proper combination of the three describes or suggests forming the recited red, green, and blue light emitting elements at a front surface of a substrate and bonding a red color filter, a green color filter, and a blue color filter adjacent to the red light emitting element, the green light emitting element, and the blue light emitting element, respectively, at a back surface of the same substrate.

Independent claims 11 and 12, along with their dependent claims 14 and 19, have been rejected as being unpatentable over Terada in view of Bando, Yoneda, and King (U.S. Patent No. 4,963,788) and considered in light of Lee (Article entitled “Lunar Building Materials – Some Considerations on the Use of Inorganic Polymers”).

Independent claim 11 recites: “forming a plurality of light emitting elements emitting red light, a plurality of light emitting elements emitting green light and a plurality of light emitting elements emitting blue light in a matrix form at a front surface of a first substrate” and “bonding a transparent substrate comprising at least a red colored layer adjacent to the light emitting element emitting red light, a green color filter adjacent to the light emitting element emitting green light and a blue color filter adjacent to the light emitting element emitting blue light at a

back surface of the first substrate.” For at least the same reasons described above with respect to claim 9, neither Terada, Bando, Yoneda, nor any proper combination of the three describes or suggests forming the recited red, green, and blue light emitting elements at a front surface of a substrate and bonding a red colored layer, a green color filter, and a blue color filter adjacent to the red light emitting element, the green light emitting element, and the blue light emitting element, respectively, at a back surface of the same substrate. King and Lee are similarly deficient. Accordingly, applicants request reconsideration and withdrawal of the rejection of claim 11 and its dependent claim 14.

Independent claim 12 recites: “forming a semiconductor element and a light emitting element emitting red light, a light emitting element emitting green light and a light emitting element emitting blue light being electrically connected to the semiconductor element at a front surface of a first substrate” and “bonding a transparent substrate comprising at least a red colored layer adjacent to the light emitting element emitting red light, a green color filter adjacent to the light emitting element emitting green light and a blue color filter adjacent to the light emitting element emitting blue light at a back surface of the first substrate.” For at least the same reasons described above with respect to claim 11, neither Terada, Bando, Yoneda, King, Lee, nor any proper combination of the five describes or suggests forming the recited red, green, and blue light emitting elements at a front surface of a substrate and bonding a red colored layer, a green color filter, and a blue color filter adjacent to the red light emitting element, the green light emitting element, and the blue light emitting element, respectively, at a back surface of the same substrate. Accordingly, applicants request reconsideration and withdrawal of the rejection of claim 12 and its dependent claim 19.

Independent claims 47 and 50, along with their dependent claims 48 and 51, have been rejected as being unpatentable over Terada in view of Bando, Yoneda and Matthies (U.S. Patent No. 6,476,783) and considered in light of Lee, and over Terada in view of Bando, Yoneda and King and considered in light of Lee.

Independent claim 47 recites: “forming a light emitting element emitting red light, a light emitting element emitting green light and a light emitting element emitting blue light at a front surface of a first substrate” and “bonding a transparent substrate comprising at least a red colored layer adjacent to the light emitting element emitting red light, a green color filter adjacent to the

light emitting element emitting green light and a blue color filter adjacent to the light emitting element emitting blue light at a back surface of the first substrate.” For at least the same reasons described above with respect to claims 9-12, neither Terada, Bando, Yoneda, King, Lee, nor any proper combination of the five describes or suggests forming the recited red, green, and blue light emitting elements at a front surface of a substrate and bonding a red colored layer, a green color filter, and a blue color filter adjacent to the red light emitting element, the green light emitting element, and the blue light emitting element, respectively, at a back surface of the same substrate. Matthies is similarly deficient. Accordingly, applicants request reconsideration and withdrawal of the rejection of claim 47 and its dependent claim 48.

Independent claim 50 recites: “forming a semiconductor element and a light emitting element emitting red light, a light emitting element emitting green light and a light emitting element emitting blue light being electrically connected to the semiconductor element at a front surface of a first substrate” and “bonding a transparent substrate comprising at least a red colored layer adjacent to the light emitting element emitting red light, a green color filter adjacent to the light emitting element emitting green light and a blue color filter adjacent to the light emitting element emitting blue light at a back surface of the first substrate.” For at least the same reasons described above with respect to claim 47, neither Terada, Bando, Yoneda, King, Lee, Matthies, nor any proper combination of the six describes or suggests forming the recited red, green, and blue light emitting elements at a front surface of a substrate and bonding a red colored layer, a green color filter, and a blue color filter adjacent to the red light emitting element, the green light emitting element, and the blue light emitting element, respectively, at a back surface of the same substrate. Accordingly, applicants request reconsideration and withdrawal of the rejection of claim 50 and its dependent claim 51.

Applicants submit that all claims are in condition for allowance.

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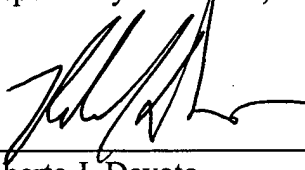
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Respectfully submitted,

Date: \_\_\_\_\_

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